

J. SCOTT MOEDE, OSB 934816  
Chief Deputy City Attorney  
scott.moede@portlandoregon.gov  
NAOMI SHEFFIELD, OSB 170601  
Deputy City Attorney  
naomi.sheffield@portlandoregon.gov  
Portland City Attorney's Office  
1221 SW 4th Ave., Rm. 430  
Portland, OR 97204  
Telephone: (503) 823-4047  
Facsimile: (503) 823-3089  
*Of Attorneys for Defendant City of Portland*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated,

Case No. 3:20-cv-00917-HZ

DECLARATION OF NAOMI SHEFFIELD

**PLAINTIFFS,**

v.

CITY OF PORTLAND, a municipal corporation,

**DEFENDANT.**

I, Naomi Sheffield, Deputy City Attorney representing defendant City of Portland in the above-entitled matter, declare as follows:

1. Attached as Exhibit 1 is a video purporting to show the area around the Justice center at approximately 11:00 p.m. on May 29, 2020.

2. Attached as Exhibit 2 is a tweet from @PortlandPolice at 11:03 p.m. on May 29, 2020.

3. Attached as Exhibit 3 is a retweet from @PortlandPolice of a tweet by @PDXFire on June 8, 2020 at 12:06 am.

4. Attached as Exhibit 4 is a tweet from @PortlandPolice on June 2, 2020 at 9:05 pm.

5. Attached as Exhibit 5 is a video tweeted from @MrOlmos on June 4, 2020 at 8:08 pm.

6. Attached as Exhibit 6 is a video tweeted from @MrOlmos on June 5, 2020 at 7:51 pm.

7. Attached as Exhibit 7 is a video tweeted from @MrOlmos on June 5, 2020 at 8:03 pm.

8. Attached as Exhibit 8 is a tweet from @PortlandPolice on May 31, 2020 at 6:55 pm.

9. Attached as Exhibit 9 is a tweet from @PortlandPolice on June 1, 2020 at 7:24 pm.

10. Attached as Exhibit 10 is a tweet from @PortlandPolice on June 3, 2020 at 7:49 pm.

11. Attached as Exhibit 11 is a tweet from @PortlandPolice on June 8, 2020 at 7:15 pm.

12. Attached as Exhibit 12 is the Order on Plaintiffs' Motion for Temporary Restraining Order, in *Abay, et al. v. City of Denver*, 1:20-cv-01616-RBJ (D. Colo.), Dkt. No. 16.

13. Attached as Exhibit 13 is a video purporting to show the protests on the night of May 31, 2020/morning of June 1, 2020.

14. Attached as Exhibit 14 is a video purporting to show part of the protests in downtown Portland on June 2, 2020.

15. Attached as Exhibit 15 is a video purporting to show part of the protests on the night of on June 5, 2020.

16. Attached as Exhibit 16 is a video purporting to show part of the protests on June 6, 2020 at approximately 11:30 pm.

17. Attached as Exhibit 17 is a video tweeted from @BonnieSilkman on June 7, 2020 at 10:19 pm.

18. Attached as Exhibit 18 is a video tweeted from @PortlandPolice on June 6 at 5:29 pm.

19. Attached as Exhibit 19 is a video tweeted from @MultCoSO on June 7, 2020 pm.

20. Attached as Exhibit 20 is the Portland Police Bureau's Crowd Management/Crowd Control policy - Directive 635.10.

21. Attached as Exhibit 21 is the Portland Police Bureau's Use of Force policy - Directive 1010.00.

22. I make this declaration in support of Defendant's Response to Motion for Temporary Restraining Order and Preliminary Injunction.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: July 28, 2020.

/s/ Naomi Sheffield  
Naomi Sheffield